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March 1, 1985

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## VIA MESSENGER

Dennis M. Coyne, Esq.  
Attorney General's Office  
Pollution Control Division  
1935 West County Road B-2  
Roseville, Minnesota 55113

Re: United States v. Reilly Tar & Chemical  
Corporation  
File No. Civ. 4-80-469

Dear Dennis:

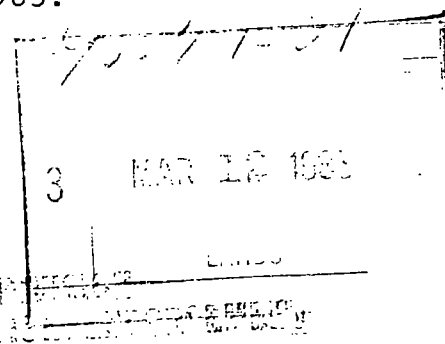
I have received and reviewed your letter of February 23rd. I believe many of the remaining scheduling conflicts can be easily resolved. The following establishes our proposal.

### Deposition of Drs. Poel, Spitzer and Shindell

The depositions of these experts will be held at the Dorsey & Whitney law offices. We have made arrangements to provide you with a secure office area for your personal use during these depositions.

### Deposition of Dr. Poel

We will agree to your requested commencement of Dr. Poel's examination at 1:00 p.m. on Monday, March 4, 1985.



DORSEY & WHITNEY

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Deposition of Mr. Harris

We understand that Mr. Harris will be available for his deposition on Tuesday, March 19, 1985 in Milwaukee. We are making arrangements for a convenient Milwaukee location. I will advise you of the location at a later date.

Deposition of Pat Fleishauer

Pat Fleishauer is presently on vacation. We believe her availability is open for the week of March 25th. I will tentatively agree to Monday, March 25th as an acceptable date.

Deposition of Dr. Spitzer

As we have previously informed you, Dr. Spitzer will only be available, for purposes of his deposition, on March 6, 1985. Thereafter, he is unavailable until some time after the first week in April, 1985.

Deposition of Dr. Shindell

Dr. Shindell's deposition is scheduled for Thursday, March 21, 1985. He will be available on Friday of that week if necessary.

Deposition of Dr. McMichael

We don't envision the deposition of Dr. McMichael as requiring more than one and one-half days of examination. Should a continuance be required, we will make the necessary arrangements at that time.

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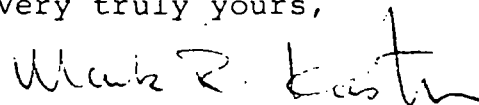
Dennis M. Coyne, Esq.  
March 1, 1985  
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Deposition of Mr. Kittel

Mr. Kittel remains hospitalized. His availability is uncertain. We will apprise you of any changes in this situation.

I will update you on our proposed schedule for your additional fact witnesses in the near future.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Mark R. Kaster". The signature is fluid and cursive, with a large, stylized "K" and "R".

Mark R. Kaster

MRK/am

cc: Honorable Crane Winton  
All Counsel of Record  
Kirby A. Kennedy